



PLANNING & DEVELOPMENT

400 BOARDMAN AVENUE
TRAVERSE CITY, MI 49684

(P) 231.922.4676

(F) 231.922.4636

www.grandtraverse.org/planning

AUG 03 2012

Planning

Land Bank

Housing Initiatives

Economic Development

Brownfield Redevelopment

*4 corners
381 wp. folder*

August 2, 2012

Ms. Susan Wenzlick
Cadillac DEQ
120 West Chapin Street
Cadillac, MI 49601

Ms. Ann Emington
Cadillac DEQ
120 West Chapin
Cadillac, MI 49601

Dear Susan and Ann;


Enclosed is the official submittal of two 381 work plans being for:

701 West Front Street and the Four Corners, Front and Division.

As you are aware, the Grand Traverse County Brownfield Redevelopment Authority is working in conjunction with the Developer of the CVS Redevelopment Project (located on 5 parcels on the corner of Front and Division streets) and DEQ to achieve a clean-up on this historically identified contaminated site. Your review of the work plans and the approval of the work identified herein is appreciated and needed to continue working towards a clean-up plan.

Should you have any questions, please contact me at 231-922-4513.

Sincerely,


Jean Derenzy, Deputy Director
Grand Traverse County
Planning and Development

Enc.



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 26, 2012

Ms. Jean Derenzy, Director
Grand Traverse County Brownfield Redevelopment Authority
400 Boardman Avenue
Traverse City, Michigan 49684

Dear Ms. Derenzy and the Grand Traverse County Brownfield Redevelopment Authority:

SUBJECT: Act 381 Work Plan Review for Four Corners Remediation Project
Intersection of North Division Street and West Front Street, Traverse City

The Department of Environmental Quality (DEQ), Remediation Division, has completed review of the work plan for additional response activities at the Four Corners Remediation Project, located at the intersection of North Division Street and West Front Street, which was submitted to us on August 3, 2012, for approval pursuant to the Brownfield Redevelopment Financing Act, 1996 PA 381, as amended (Act 381), MCL 125.2665.

Upon consideration of relevant factors identified in Section 15 of Act 381, and based upon representations and information contained in your submittal, the DEQ approves the following proposed additional response activities:

- Additional response activities at the CVS development parcels: \$600,000.
- Groundwater monitoring: \$600,000.
- Coordination of activities and work plan preparation: \$250,000.
- Brownfield plan and Act 381 work plan preparation, DEQ review fees, and 15% contingency on approved activities: \$242,500.

The additional response activities proposed at leaking underground storage tank (LUST) parcels A and C, the road right-of-ways (ROWs), and remaining eligible properties are conditionally approved, subject to submittal of detailed work plans once specific scopes of work are identified. Detailed work plans for the proposed response activities at LUST parcels A and C, the road ROWs, and remaining eligible properties must be submitted before costs payable with state school tax capture can be approved. However, the proposed response activities appear to be eligible under Act 381, subject to further review and approval by the DEQ.

A table is attached which lists specific approved and conditionally approved items and approved costs.

The total amount of this work plan approved for reimbursement with tax increment revenues, including taxes levied for school operating purposes, to conduct eligible activities is limited to \$1,692,500. Of this amount no more than \$817,824 shall be from taxes levied for school operating purposes, which is the ratio of school taxes to local taxes levied on the eligible property.

\$817,824 - School Tax Capture (48.32%)
+ \$874,676 - Local Tax Capture (51.68%)
\$1,692,500 Total

Pursuant to Section 15(10) of Act 381, the DEQ's approval or denial of a work plan or portion of a work plan is a final decision regarding the use of taxes levied for school operating purposes for reimbursement.

Please note that in making this determination, the DEQ is not making any findings about exemptions to liability under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).

Approval or conditional approval of the work plan is only for the purpose of eligibility for tax capture and reimbursement under Act 381. The adequacy of response activities designed to meet criteria under Part 201 is *not* part of this determination.

Pursuant to Section 15(1)(a) of Act 381, the Authority may approve the use of taxes levied for school operating purposes without DEQ approval for the following activities:

- a. Site investigation activities required to conduct a baseline environmental assessment (BEA) and to evaluate due care activities required under Part 201;
- b. Conducting a BEA; and
- c. Preparing a due care plan to comply with Part 201.

All other activities (due care activities, additional response activities, interest associated with environmental eligible activities) are only eligible for reimbursement with taxes levied for school operating purposes if undertaken after DEQ approval of a work plan.

If activities in addition to those approved in this work plan are determined to be necessary and/or if the approved costs will be exceeded, prior DEQ approval is necessary. Please be advised that the amount of tax capture is limited to actual expenditures with the exception of excess capture allowed for deposit into the local site remediation revolving fund, if applicable. Capture of tax increment revenues from the eligible property shall be in accordance with Section 13(2) of Act 381. Adequate records should be maintained for auditing purposes and be made available to the state upon request.

All actions taken pursuant to this work plan must be undertaken in accordance with the requirements of all applicable or relevant and appropriate state and federal laws, rules, and regulations, including, but not limited to, Part 201 of the NREPA, the Part 201 Rules, and laws relating to occupational safety and health. This approval does not obviate a person's obligation to obtain and maintain compliance with any permit or authorization required under state or federal laws.

Pursuant to Section 13(8) of Act 381, the DEQ may pursue cost recovery for response activity costs paid for with tax increment revenues from persons who are liable for the costs of the eligible activities at the eligible property.

The cost to the state for conducting this review will be determined and identified to you via separate correspondence for reimbursement as provided by Section 15(11) of Act 381.

A copy of all reports and findings must be furnished to the DEQ project manager, Ms. Ann Emington.

If you have any questions regarding this letter, please contact Ms. Emington at 231-876-4453; via e-mail at emingtona@michigan.gov; or at the Cadillac District Office.

Sincerely,



Steven Kitler
District Supervisor
Remediation Division
231-876-4455

sk/sw/tl

Attachment

cc: Michigan Department of Treasury
Ms. Karla Campbell, Michigan Economic Development Corporation
Mr. William Davidson, Horizon Environmental
Ms. Susan Erickson, DEQ
Ms. Ann Emington, DEQ
Ms. Susan Wenzlick, DEQ

FOUR CORNERS ACT 381 WORK PLAN
APPROVAL WORK SHEET

Approved on September 26, 2012	Conditionally Approved, subject to submittal of further detail.	Approved Cost
CVS Development Parcels: 1. Additional Response Activity (mechanical and electrical). 2. Additional Response Activity (sparge system OM&M up to 10 years). 3. Additional Response Activity (OM&M of Multi-Phase Extraction System).		1. \$100,000 2. \$400,000 3. \$100,000
	LUST Parcel A: 1. Enhancements to Multi-Phase Extraction System. 2. OM&M of Multi-Phase Extraction System.	Pending submittal of detailed work plan.
	LUST Parcel C: 1. Design and Install In Situ Groundwater Treatment. 2. OM&M of In Situ Groundwater Treatment (up to 10 years).	Pending submittal of detailed work plan.
	Road ROWs and Remaining Eligible Properties: 1. Remediation System Design, Install, Operation & Maintenance. 2. Remedial Enhancements and other Additional Response Activities.	Pending submittal of detailed work plan.
Groundwater Monitoring 1. Monitoring Well Installation. 2. Groundwater Monitoring (Sampling, Analysis, and Reporting) for 10 years.		1. \$100,000 2. \$500,000

FOUR CORNERS ACT 381 WORK PLAN
 APPROVAL WORK SHEET - continued

Coordination of Activities and Implementation of Work Plan Preparation: 1. Environmental Consulting – Preparation of Preliminary Designs/ Implementation Work Plans for Remedial Systems. 2. Environmental Consulting – Oversight and Coordination of Activities.		1. \$150,000 2. \$100,000
General Activities and Act 381 Plans and Fees: 1. Preparation of the Brownfield Plan. 2. Preparation of the Act 381 Work Plan. 3. DEQ Review Fees. 4. 15% Contingency (Adjusted to 15% of Approved Response Activities).		1. \$10,000 2. \$10,000 3. \$5,000 4. \$217,500
Total Approved Amount		\$1,692,500

Emington, Ann (DEQ)

4 Corners, GTC.

381 folder

From: Emington, Ann (DEQ)
Sent: Wednesday, July 25, 2012 4:18 PM
To: Doug Kilmer (KilmerD@aktpeerless.com)
Cc: 'Don Conway'
Subject: RE: Contact Information

Doug,
I made a mistake. I agree with Don that the wells should be installed after our system is in place.

Please contact me if you have any questions.

Ann Emington

Senior Geologist, Remediation Division, DEQ
Cadillac District Office
231-876-4453
emingtona@michigan.gov

God Bless America

From: Don Conway [mailto:dgconway@goslingczubak.com]
Sent: Wednesday, July 25, 2012 3:47 PM
To: Emington, Ann (DEQ)
Subject: RE: Contact Information

Ann,
I believe it would be best if the replacement monitoring wells went in after our system, creating fewer obstacles for Clean Harbors.

Donald G. Conway, C.P.G.
Senior Project Manager
GOSLING CZUBAK ENGINEERING SCIENCES, INC.
Direct Dial (231) 933-5132
Cell (231) 645-2112
Fax (231) 941-4603
dgconway@goslingczubak.com

From: Emington, Ann (DEQ) [mailto:EMINGTONA@michigan.gov]
Sent: Wednesday, July 25, 2012 3:22 PM
To: 'Doug Kilmer'
Cc: Don Conway
Subject: RE: Contact Information

When do you plan on installing these wells before or after our treatment system installation? We would prefer before.

Please contact me if you have any questions.

Ann Emington

Senior Geologist, Remediation Division, DEQ
Cadillac District Office
231-876-4453
emingtona@michigan.gov

God Bless America

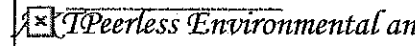
From: Doug Kilmer [<mailto:KilmerD@aktpeerless.com>]
Sent: Monday, July 23, 2012 3:12 PM
To: Emington, Ann (DEQ)
Cc: Don Conway (dgconway@goslingczubak.com)
Subject: RE: Contact Information

Ann:

Thanks for the map.

Everything is on schedule to the best of my knowledge, but coordinate directly with Bill Dow at Seerco for the construction schedule. Also, I would suggest that Don check in to make sure there have not been any last minute changes in utility plans that could affect your schedule or work activities. I know some minor changes have been coming from URS, but I believe Don was copied with those and they were not an issue with the system.

Douglas S. Kilmer, P.G.
Senior Geologist

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f: 248-615-1334
c: 616-916-4129
Chicago Detroit Farmington Lansing Saginaw Traverse City
www.aktpeerless.com

From: Emington, Ann (DEQ) [EMINGTONA@michigan.gov]
Sent: Monday, July 23, 2012 2:07 PM
To: Doug Kilmer
Cc: Don Conway (dgconway@goslingczubak.com)
Subject: FW: Contact Information

Here is the email that I sent in March. Is everything moving along according to schedule? I haven't seen any revisions to the schedule so we are planning on beginning our work on 8/7/12.

Please contact me if you have any questions.

Ann Emington

Senior Geologist, Remediation Division, DEQ
Cadillac District Office
231-876-4453
emingtona@michigan.gov

God Bless America

From: Emington, Ann (DEQ)
Sent: Wednesday, March 14, 2012 12:09 PM
To: 'Megan Napier'
Cc: DeGood, Chris
Subject: RE: Contact Information

Megan and Chris,
Here is a map with the proposed location of replacement monitor wells. There are three sets of cluster wells. In these locations I would like to see a shallow well installed straddling the water table and a deeper well installed at a depth of 26-32 feet below grade. All the remaining monitor well locations should be shallow wells screened from 11-16 feet below grade.

Please contact me at the telephone number below if you have any questions.

Ann Emington
Senior Geologist, Remediation Division
Department of Environmental Quality (DEQ)
Cadillac District Office
TX: 231-876-4453
FX: 231-775-1511
email: emingtona@michigan.gov

God Bless America. In God we trust!

From: Megan Napier [<mailto:napiern@aktpeerless.com>]
Sent: Wednesday, March 14, 2012 11:30 AM
To: Emington, Ann (DEQ)
Cc: DeGood, Chris
Subject: Contact Information

Ann,

Below is Chris DeGood's contact information.

Christopher G. DeGood, PE
Senior Civil Engineer



10850 Traverse Highway Suite 3365
Traverse City, MI 49684
Tel: 231.932.7592
[Website](#) | [Map](#)

Direct: 231.922.4285
Mobile: 231.409.4275
Fax: 231.932.7594
Email: Chris_DeGood@URSCorp.com

Megan Napier, P.E.
Director

Email napierm@aktpeerless.com
Tel 248.615.1333 x244
Cell 248.302.1289



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Farmington, MI 48336
aktpeerless.com | [Facebook](#) | [LinkedIn](#)

Emington, Ann (DEQ)

4 Corners, GTCO.
381 W.P. folder

From: Emington, Ann (DEQ)
Sent: Thursday, May 24, 2012 9:31 AM
To: 'Doug Kilmer'
Cc: Anne Jamieson; Megan Napier
Subject: RE: Four Corners CVS Store Development

Doug,

I am not certain, based on the limited information I have, that I can give an opinion. I need to know if the surface water runoff will be sloped from other areas of the parking lot into the green paver area or will this area encounter "normal" precipitation? I assume that most of the surface runoff will go to some sort of catch basin. In regard to the PNAs and metals in this area, there is no documentation that the soil contamination extends beyond the upper two feet of soil, which is scheduled to be removed from this area. Based on normal precipitation rates and the removal of the contaminated area, I do not believe the use of pavers would result in any additional groundwater contamination or added mounding in the area of the AS/SVE gallery.

I would be more concerned with the use of an irrigation system in the green areas. It has been my experience that the additional water added in the green space from regular use of an irrigation system can raise the water table thus resulting in less recovery from the multiphase extraction system. This in fact occurred at the SE corner of Front and Division at the former Finch's Amoco. To address this, I would recommend an adequate design to prevent irrigation water from reaching the groundwater.

Please contact me at the telephone number below if you have any questions.

Ann Emington
Senior Geologist, Remediation Division
Department of Environmental Quality (DEQ)
Cadillac District Office
TX: 231-876-4453
FX: 231-775-1511
email: emingtona@michigan.gov

God Bless America. In God we trust!

From: Doug Kilmer [mailto:KilmerD@aktpeerless.com]
Sent: Wednesday, May 23, 2012 9:32 PM
To: Emington, Ann (DEQ)
Cc: Anne Jamieson; Megan Napier
Subject: Four Corners CVS Store Development

Ann:

Thanks for your continued efforts on this project. We received notification today that the DEQ Act 381 Work Plan for the project was approved.

We have another issue we would like to get your opinion on. The City of Traverse City is requiring a certain percentage of the site surface/parking area be "green", or in this case, be constructed to allow

5/24/2012

infiltration of precipitation to decrease the load of storm water conveyed into the adjacent creek. They have asked that a certain square footage of the site surface be paved/covered with permeable materials. The last row of parking (eastern end of site) is proposed to be covered with green pavers to allow infiltration.

Based on our recent soil sampling, we have concerns about the appropriateness of the use of permeable surface materials and its effects on the underlying aquifer and contaminant plume. As previously demonstrated, there are exceedances of GSIP criteria for several constituents, including metals and PNAs, which could result in additional groundwater contamination. In addition, the proposed green pavers are in the proximity of the GTCBRA's proposed sparge gallery, and could short circuit through that area. We understand that the current surface is permeable – our concern in part is that with just the limited portion of the site surface being permeable, it could concentrate precipitation run-off into a smaller area, causing a greater downward head in a localized area.

Our client is in discussions with the City on appropriate designs, and Velmeir would appreciate it if we could get your opinion on this issue.

Thanks,

Douglas S. Kilmer, P.G.
Senior Geologist
Investigation & Remediation

Email kilmerd@aktpeerless.com
Cell 616.916.4129



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RECEIVED DEQ - RRD CADILLAC

REC'D

ERNIE ☒ PM Initials: *AE*

SID ☐

FILE:

*4 corners
Act 381 Work Plan
GTC.*

ACT 381 WORK PLAN

TO CONDUCT
ELIGIBLE DEQ RESPONSE
AND/OR
MEGA NON-ENVIRONMENTAL
ACTIVITIES

Four Corners Remediation Project
N. Division Street and W. Front Street

May 30, 2012

Prepared by:

**Horizon Environmental Corporation for the Grand Traverse County Brownfield
Redevelopment Authority**

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EXHIBITS

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Figure 2	Eligible Property Map(s)
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Figure 4	Cleanup Goals and Area Designations Map

TABLES

Table 1	Summary of Costs for Eligible Activities
Table 2	DEQ Tax Capture/Reimbursement Schedule

ATTACHMENTS

Attachment A	Approved Brownfield Plan and Resolution(s) Approving
Attachment B	Property Description Summary Table
Attachment C	Summary Maps of Groundwater Quality Conditions
Attachment D	Historical Property Use Summary

1.0 INTRODUCTION

The Grand Traverse County Brownfield Redevelopment Authority ("Authority") and Grand Traverse County Board of Commissioners adopted an Amended Brownfield Plan ("Plan") to encourage and facilitate the remediation of the Four Corners Project property ("Eligible Property") generally located at the intersection of N. Division Street and W. Front Street in the City of Traverse City, Grand Traverse County, Michigan. A copy of the Brownfield Plan is included in Attachment A. This Act 381 Work Plan was developed to facilitate implementation of certain additional response activities described in the Plan. This Act 381 Work Plan describes the Eligible Property conditions and coordinated remediation framework which are to be implemented to: (1) prevent further degradation of the environmental quality at the Eligible Property; (2) restore the environmental quality of the Eligible Property; (3) protect the environmental quality of adjacent areas; (4) encourage participation in the implementation of response activities by liable parties; and (5) support the redevelopment of the Eligible Property. Completion of the activities described herein will enhance the redevelopment potential of the Eligible Property.

The above stated goals are consistent with the purpose of the Authority, which is to promote the revitalization of environmentally distressed areas through the implementation of the Brownfield Redevelopment Authority Act ("Act"). The Act provides the ability to utilize tax increment financing, which captures taxes due to the increased value of the redeveloped property, to pay for certain "Eligible Activities", as that term is defined in the Act. It is the intention of the Authority to utilize this Act 381 Work Plan to facilitate a coordinated approach to addressing environmental contamination on the Eligible Property through active participation of parties responsible for the contamination. Costs for those response activities completed by liable parties will not be reimbursed through tax increment financing, however the Authority, at its discretion, may elect to implement certain of the response activities described herein to protect public health and the environment and/or to facilitate more active participation by liable parties in the cleanup efforts.

1.1 ELIGIBLE PROPERTY INFORMATION

1.1.1 PROPERTY LOCATION

The Eligible Property is comprised of 25 parcels and the intervening public thoroughfares encompassing approximately 7.5 acres, located in the City of Traverse City. The general location of the Eligible Property is depicted on the map in Figure 1. Individual parcels or groups of parcels which comprise the Eligible Property have been assigned letter designations as shown on Figure 2 and legal descriptions, tax identification numbers, basis for parcel eligibility, current land use, and ownership information is provided as Attachment B to this Act 381 Work Plan. The following defined subdivisions of the Eligible Property have been established for reference purposes and clarity within the context of this Act 381 Work Plan:

CVS Development Parcels: The CVS Development Parcels are comprised of a total of five individual parcels on the northeast corner of the intersection of Division Street and West Front Street. The individual parcels include the letter designations B, J, K, N, and P on Figure 2.

Eligible activities are included within this Act 381 Work Plan to support future implementation and operation of an air sparge system for which the below ground infrastructure was included in a previous Act 381 Work Plan submitted to MDEQ in March 2012 by AKT Peerless Environmental Services and TVC Traverse City Company, LLC to support redevelopment of these properties as a CVS retail pharmacy; groundwater monitoring to evaluate the effectiveness of the sparge system; and coordination of these activities with response activities on other portions of the eligible property.

Leaking Underground Storage Tank (LUST) Parcels: A total of three LUST Parcels for which releases from underground storage tank (UST) systems have been reported are included within the Eligible Property. The three parcels are designated as parcels A, B, and C on Figure 2. A fourth property located immediately outside of the Eligible Property at 701 West Front Street was formerly operated as a gasoline service station and had reported releases from the UST system. The 701 West Front Street parcel is included in a separate brownfield plan and Act 381 Work Plan and is not a part of this Act 381 Work Plan. The releases from the 701 West Front Street property, however, have to some degree contributed to a downgradient contaminant plume in groundwater for which Eligible Activities are proposed within the context of this Plan.

Road Right-of-Ways (ROWs): Road ROWs are included within the Eligible Property to facilitate completion of Eligible Activities. The portions of West Front Street, Division Street, Maple Street, and the alley which extends from N. Division Street to N. Oak Street north of West Front Street are included within the Eligible Property.

Remaining Eligible Properties: All parcels of Eligible Property not included in the above three subdivisions have been included in this Act 381 Work Plan because they either overlie the commingled groundwater plume emanating from the LUST Parcels and may represent opportunities for access to conduct groundwater cleanup activities or are candidate locations for groundwater monitoring activities to define the nature, extent, and migration of the plume.

1.1.2 PROPERTY ELIGIBILITY

The Eligible Property described in this Plan is eligible for participation in the Authority's brownfield redevelopment efforts due to the presence of petroleum contaminated soil and/or groundwater present at the majority of the parcels within the Eligible Property. Concentrations of contaminant constituents have been demonstrated to exceed the generic residential cleanup criteria described in Part 201 of the Michigan's National Resources and Environmental Protection Act, 1994 PA 451, as amended ("NREPA") on, or within the public ROWs immediately adjacent to, 21 of the 25 parcels within the Eligible Property. Documentation of this identified contamination is included within Attachment C in the form of a comprehensive mapping of groundwater above Part 201 generic residential criteria completed on behalf of the MDEQ by DLZ in 2005 and a map summary of 2011 data recently compiled by DLZ for MDEQ which includes additional sampling points not present during the 2005 delineation efforts. Based on the presence of contamination in excess of the Part 201 generic residential cleanup criteria, these parcels within the Eligible Property meet the definition of a "facility" as defined in Part 201.

The two parcels which comprise parcel F and the parcels comprising parcels T and U have not been demonstrated to be contaminated at concentrations above generic residential criteria, but are located immediately adjacent and contiguous to properties which have been demonstrated to be a Facility. These four parcels are located in the immediate vicinity of major road intersections within the Eligible Property and the development of these parcels is estimated to

increase the captured taxable value of the remaining parcels within the Eligible Property. Additionally, these adjacent and contiguous properties may provide for strategic placement of monitoring wells for defining the limits of the commingled contaminant plume present throughout the majority of the eligible property.

A depiction of the parcels which comprise the Eligible Property is provided in Figure 2 and a summary of information on these parcels is provided in Attachment B.

1.1.3 CURRENT OWNERSHIP

A summary of the current ownership for each parcel is provided in Attachment B including the name of the owner and the address for each parcel.

1.1.4 PROPOSED FUTURE OWNERSHIP

There are no known future owners of property with the exception of TVC Traverse City Company, LLC which intends to purchase parcels B, J, K, N, and P. Contact information is:

TVC Traverse City Co., LLC
Contact: Stephen Bock
5757 W, Maple Road, Suite 800
West Bloomfield, MI 48332

Telephone: (248) 539-7997

1.1.5 DELINQUENT TAXES, INTEREST, AND PENALTIES

No delinquent taxes, interest, or penalties are known to exist for the Property.

1.1.6 EXISTING AND PROPOSED FUTURE ZONING

The existing zoning of the eligible property includes the following zoning districts:

Commercial C-1 (Office Service District)
Commercial C-2 (Neighborhood Center District)
Residential R-1b (Single Family Dwelling District)
Municipal GP (Government/Public District)

The zoning designation for each parcel is provided on Attachment B. The city planning maps indicate that the Property is within a portion of the planned western 'gateway' to downtown.

1.2 HISTORICAL USE OF EACH ELIGIBLE PROPERTY

The historical use of each parcel within the eligible property is summarized in tabular form in Attachment D. The tabular summary also includes a listing of potentially responsible parties for the releases from the UST systems. A summary of historical property occupants at approximately five year intervals as determined through review of City Directories is also provided in Attachment D.

1.3 CURRENT USE OF EACH ELIGIBLE PROPERTY

The current use of each parcel is summarized in Attachment B.

1.4 PROPOSED REDEVELOPMENT AND FUTURE USE

The remediation of the Four Corners contaminant plume will promote redevelopment of parcels on the Eligible Property, as well as remove an on-going threat to groundwater in areas adjacent and near the Eligible Property. The Project will significantly contribute to cleanup of one of the City's more significant groundwater contamination problems.

The proposed Plan is an opportunity to foster cooperation among the Stakeholders and maximize the sustainability of remediation by addressing the entire contaminant plume at one time. The Plan may also promote the creation of jobs by subsequent businesses that are willing to occupy some of the parcels once the impediment of the impaired environmental condition is removed. Completion of this project will not only provide retail opportunities in this area of Traverse City, it will also bring additional investment and stabilization to the neighborhood.

A specific redevelopment project is proposed for the CVS Development Parcels. Eligible activities including Due Care and Additional Response Activities to support the redevelopment of the CVS Development Parcels was included in a previous Act 381 Work Plan (March 2012).

The CVS project consists of demolishing the three buildings on-site and construction of a 13,225 square foot single-story retail building with supporting infrastructure (e.g., paved parking lots and drives, sidewalks, landscaped buffers, etc.). The development will be new construction. The project includes building new infrastructure and parking surfaces, and creating a green area. This phase of work also will require the improvement of the sidewalks to match other downtown pedestrian thoroughfares. The development as a whole will result in additional tax revenue for all taxing jurisdictions, once eligible activities have been reimbursed. Total capital investment in the project is anticipated to be approximately \$4.6 million in land and improvements. The Development Team anticipates commencing demolition and cleanup in June 2012.

2.0 CURRENT PROPERTY CONDITIONS

2.1 SUMMARY OF ENVIRONMENTAL CONDITIONS

The Eligible Property is a location of commingled petroleum contamination in the area of the intersection of Division and W. Front Streets in Traverse City, Grand Traverse County, Michigan. Contamination from releases from UST systems at each of the four corners of the intersection of Division and West Front Streets was discovered in or about 1991. Subsequent UST removal and investigation activities identified additional areas of contamination, as described on Table 1. A total of seven LUST incident cases at the properties occupying the intersection of Division and W. Front Streets have been opened between 1991 and 1999 with the DEQ. To date, all of the incidents remain "Open", indicating the cases have not been resolved in accordance with the LUST corrective action standards set forth in Part 213.

Investigations conducted by the UST owners and/or the DEQ through their Project Management-Storage Tank Division ("PM-STD") program determined that the Eligible Property was underlain by a commingled contaminant plume of free phase and dissolved phase

petroleum hydrocarbons. The primary constituents of concern identified in soil and groundwater at the Eligible Property in excess of the Part 201 generic residential cleanup criteria include benzene, toluene, ethylbenzene, and xylenes ("BTEX"). Over time, the plumes from the LUST Parcels have become commingled in the general area of the street intersection and have migrated downgradient to the north and east beneath a majority of the Eligible Property. A delineation of the current approximate extent of the commingled plume is provided as Figure 3.

An exposure pathway evaluation indicated that applicable exposure pathways to contaminated groundwater include residential and commercial Drinking Water ("DW"), Groundwater – Surface Water Interface ("GSI"), Groundwater Volatilization to Indoor Air Inhalation ("GVIIC"), and Groundwater Contact ("GCC"). Exceedances of one or more of these criteria were identified in 47 monitoring wells in 2005, including wells located at each of three LUST Parcels within the Eligible Property and the LUST site at 701 West Front Street.

Various corrective actions have been deployed at one or more of the four LUST locations. These included both free product recovery and/or groundwater treatment (e.g., multi-phase extraction and treatment systems). Some limited remediation has been effected, but due to the lack of a comprehensive cleanup of the contaminant plume as a whole, the remedial gains have been limited, and in some areas have been offset by migration of contamination from areas not remediated.

The MDEQ designated the Four Corners as a Part 201 site in 2006. Recent reports and verbal communications indicate free phase petroleum product ("free product") remains in the subsurface on Parcel A (current Speedway location) and intervening public thoroughfare locations which border the other four LUST locations. Impacted soil remains at the Eligible Property despite the soil removal actions that have been conducted to date on the individual properties. In addition, groundwater sampling conducted at the Eligible Property in 2011 by the BRA and the DEQ has confirmed that not only is free phase product and dissolved phase petroleum (i.e., BTEX) contamination still present, but that the contaminant plume has expanded laterally since the DEQ investigations in the early to mid-2000's.

Documentation of this identified contamination is included within Attachment C in the form of a comprehensive mapping of groundwater above Part 201 generic residential criteria completed on behalf of the MDEQ by DLZ in 2005 and a map summary of 2011 data recently compiled by DLZ for MDEQ which includes additional sampling points not present during the 2005 delineation efforts.

3.0 SCOPE OF WORK

3.1 DEQ ELIGIBLE ACTIVITIES – ADDITIONAL RESPONSE

The remediation framework presented herein involves a combination of active remediation methods and groundwater monitoring activities as starting points. The additional response activities are meant to be flexible and dynamic and implemented in a coordinated fashion to achieve the remedial goals established for the Eligible Property as a whole. The primary goal is to establish the remedial framework within the context of this Act 381 Work Plan but to have parties liable for the releases at the LUST parcels implement the response activities outside of the tax increment financing aspect of the program. The Authority may, at its discretion with appropriate approvals from MDEQ, choose to implement certain of the response activities as necessary and appropriate to protect public health and the environment or to optimize

participation of the liable parties in the cleanup efforts. If the Authority implements response activities it may then seek reimbursement through tax increment financing or through solicitation of contributions from liable parties.

Eligible Activities, including operating remediation systems and monitoring groundwater quality, will be conducted until the cleanup objectives are obtained. The local community is striving for a final and permanent remedy for the Eligible Property that achieves a degree of cleanup that does not rely on institutional controls over use of natural resources and/or tolerate incremental increased risks to the well being of its residents due to regulatory or scientific uncertainty. Specifically, the following risks/uncertainties will persist in this portion of downtown Traverse City until such time as the commingled plume is cleaned up.

- Although there are no current users of groundwater in the area of the commingled plume, no reliable, enforceable administrative controls are in place to prevent future groundwater use and the community is generally not supportive of such an approach.
- The MDEQ and regulatory agencies nationwide are currently re-evaluating screening criteria to address exposure to hazardous substances through vapor intrusion into buildings. Given the high residual contaminant levels present in the four corners plume, the community is not willing to accept the uncertainty associated with this pathway while "acceptable levels" are established.
- The potential for contaminated groundwater to adversely impact Kids Creek or other area surface water has not been fully established.
- The commingled plume is known to have expanded in the past 5 years and significant hydrocarbon mass is present in the aquifer well beyond the reach of the source area treatment systems in-place (Speedway and former Shell station) or proposed for construction/operation by MDEQ (CVS development site).

Cleanup goals have been established by the Authority for the Eligible Property by location and parcel use, and are based upon potentially applicable and relevant exposure pathways, to protect both the Eligible Property and surrounding areas, as well as prevent further environmental degradation. Cleanup goals of unrestricted non-residential cleanup criteria have been established for the LUST parcels, certain parcels adjoining the LUST parcels, and the area of the intersection of Division and West Front Streets as depicted on Figure 4. Cleanup goals for the remaining area of Eligible Property have been established by the Authority as unrestricted residential cleanup criteria and groundwater/surface water interface (GSI) criteria.

Table 2 summarizes the necessary activities at each of five management areas of the site, as depicted on Figure 4. A general summary of Eligible Activities to be implemented include:

1. Design and construction of remediation systems.
2. Operation and maintenance of remediation systems until the project's remedial objectives are achieved. This includes currently and formerly operated systems with existing infrastructure (i.e., restart systems), and proposed new systems at the LUST Parcels and within the downgradient commingled plume.
3. Routine groundwater monitoring on the Eligible Property to monitor site conditions and remediation progress including installation of new monitoring wells as necessary and appropriate to define the nature and extent of the commingled plume and evaluate progress over time in achieving the remedial goals for the Eligible Property.

4. Identifying opportunities for additional active remediation (e.g., soil excavation) in conjunction with potential future redevelopment of the Eligible Property and adjacent areas that are impacted.
5. Implementing soil excavation and contaminated soil disposal, as necessary, in conjunction with potentially proposed street and/or utility renovation activities.
6. Regular reporting of operations, maintenance and monitoring ("OM&M") activities and results to facilitate coordination of remedial efforts, as well as routine communications and meetings with project Stakeholders to discuss progress.
7. Additional response activities in the form of design and construction of above-ground elements of an air sparge system and operation of the system to facilitate project objectives.
8. Professional services associated with coordination and implementation of Eligible Activities throughout the Eligible Property to efficiently achieve cleanup goals.

Remediation systems are present or are anticipated to be present on each of the three LUST Parcels, as well as in N. Division Street. Effective operation of these systems concurrently is integral to the success of this project. Routine groundwater monitoring in these source areas will be used to demonstrate the efficacy of the remediation approach, as well as to guide and improve operational efficiencies. In some instances parties are operating source areas treatment systems and conducting groundwater monitoring activities (e.g., Speedway station and the planned MDEQ system on the CVS development parcels). It is not the intention of this plan to supplant these activities, but rather to have a mechanism in place to continue operation and monitoring of the systems should they be prematurely terminated. It is also contemplated that coordination of remedial and monitoring efforts performed by various parties and tracking of environmental progress in a comprehensive and coordinated fashion may be necessary going forward.

Downgradient groundwater monitoring will be conducted to verify the effects of the remedial activities and to guide additional remediation of this portion of the commingled plume to achieve cleanup goals within a reasonable time period (e.g., five to ten years). Initially, groundwater sampling and analysis should be conducted quarterly to assist with the establishment of an analytical database from which future remediation decisions may be made.

The following sections provide summaries of anticipated Eligible Activities at certain specific parcels or groups of parcels within the Eligible Property.

3.1.1 ELIGIBLE ACTIVITIES FOR CVS DEVELOPMENT PARCELS

The CVS Development Parcels include LUST Parcel B and adjoining parcels (Parcels J, K, N, and P) to the east. Eligible Activities to be implemented on the CVS Development Parcels include the following:

- Design and construction of above ground elements of the air sparge system. It is anticipated that this system will be placed within the building to be constructed by MDEQ for its multi-phase extraction treatment system and will be comprised of blower systems to introduce air to the aquifer system and recover soil gas from the sparge trench, as necessary, based on observed concentrations.
- Groundwater monitoring activities to evaluate the effectiveness of the sparge system operation.

- Contingency for future operation of the MDEQ multi-phase extraction system in the event that State funding of operation of that system be terminated while the efficacy of the system is still contributing to effective source area treatment.
- Coordination of activities including interaction with MDEQ on its system operation and tracking of groundwater quality improvements both prior to and following sparge system implementation.

3.1.2 ELIGIBLE ACTIVITIES FOR LUST PARCELS A AND C

A multi-phase extraction system is present at Parcel A, the current location of the Speedway station, which is operated on a periodic basis by Speedway. Effective future operation of the multi-phase extraction system or other treatment approach designed to collect and treat existing soil and groundwater contamination and recover free-phase product is of critical importance to achieving cleanup objectives throughout the Eligible Property. Provisions are included within this Work Plan to operate, maintain, and enhance, as necessary, source area treatment and containment/recovery of free-phase product at this parcel in the event that it is determined that efforts undertaken by Speedway or other parties associated with the parcel are found to be inadequate for effectively achieving cleanup objectives for the Eligible Property or should the source treatment activities be terminated prematurely. Given the uncertain scope of these remedial activities, the Authority is requesting "conditional" approval of these activities and associated costs from MDEQ subject to submittal of a more detailed work plan once the remedial needs are better established for MDEQ review and approval prior to implementation.

Parcel C is the former location of Finch's Amoco gas station and has been redeveloped for use as a bank that is currently occupied by Citizens Bank. In 2001 a multi-phase extraction system was installed at the site by the MDEQ to abate acute risks associated with free-phase product and significantly contaminated soil and groundwater. The system was operated by MDEQ through December 2004. At the time of termination of the treatment system, MDEQ had determined that the acute risk abatement objectives had been achieved. Limited groundwater monitoring activities completed in 2005 and 2011 indicates that groundwater contamination remains in the dissolved phase at this location. Groundwater monitoring activities contemplated within this Plan will include an early emphasis on characterization of groundwater quality conditions at Parcel C to establish the scope and necessity for additional response activity in the form of in-situ treatment of groundwater via biosparging or other means of oxygen introduction to the aquifer, as appropriate to meet cleanup objectives for the Eligible Property in a reasonable timeframe. The potential necessity for implementation of groundwater treatment at this parcel within the Eligible Property warrants inclusion of provisions for groundwater treatment at this location within this Work Plan. Consistent with the approach for Parcel A above, the Authority is requesting "conditional" approval of these activities and associated costs from MDEQ subject to submittal of a more detailed work plan once the remedial needs are better established for MDEQ review and approval prior to implementation.

3.1.3 ELIGIBLE ACTIVITIES FOR ROAD RIGHT-OF-WAYS AND REMAINING ELIGIBLE PROPERTIES

In addition to the remedial focus on source control and cleanup of the LUST Parcels, significant mass of contamination has migrated beyond these source areas in the form of a commingled groundwater plume. Sufficient contaminant mass is present in the commingled groundwater plume that additional response activities are warranted to achieve cleanup objectives for the Eligible Property and prevent further expansion of the contaminant plume to currently unaffected properties. The approach to the additional response activities planned for the downgradient

contaminant plume is the implementation of in situ remedial technologies with an emphasis on the introduction of oxygen to the aquifer system to enhance natural biological degradation processes. This approach may be supplemented, as appropriate, with in-situ stripping (i.e., air sparging) technologies to further reduce contaminant mass in select areas of the plume to more efficiently achieve cleanup goals and prevent further plume expansion. To the extent feasible, these additional response activities will be implemented in the area bound by Kids Creek to the north, the southern edge of the City alleyway south of Kids Creek extending from N. Division Street to Oak Street, and City-owned property at Parcels Y and Z. The precise geographic focus of the planned additional response activities may, however, extend beyond or be centered outside of this presumed area if results of groundwater monitoring activities indicate an alternative emphasis is warranted.

Consistent with the approach for the LUST Parcels described above, the Authority is requesting “conditional” approval of these activities and associated costs from MDEQ subject to submittal of a more detailed work plan once the remedial needs are better established for MDEQ review and approval prior to implementation.

3.1.4 GROUNDWATER MONITORING ACTIVITIES

As previously referenced, sound remedial decision-making will require establishment of an understanding of the nature and extent of groundwater quality conditions and that remedial progress be tracked through observations of changes in groundwater quality over time. Accordingly, groundwater monitoring activities including routine groundwater sampling and analysis and installation of additional monitoring wells is an integral part of this Act 381 Work Plan. It is contemplated that up to twenty (20) additional monitoring wells including clustered depth-discrete wells will be necessary to establish a fully functional groundwater monitoring network. Initially, groundwater sampling and analysis is proposed to be implemented on a quarterly basis with groundwater samples analyzed for volatile organic compounds reflective of the hydrocarbon releases in the area as well as water quality parameters which reflect the degree to which natural attenuation/degradation processes are occurring within the aquifer. The frequency of groundwater monitoring will be decreased over time as the rate of change in groundwater quality and seasonal variability in conditions is better defined.

These groundwater monitoring activities may be implemented at any location within the Eligible Property. Monitoring efforts will be coordinated, to the extent feasible, to complement and enhance groundwater monitoring completed by MDEQ and/or liable parties on the LUST parcels.

3.1.5 COORDINATION OF REMEDIAL ACTIVITIES AND PREPARATION OF DETAILED IMPLEMENTATION WORK PLANS

As previously discussed, the Authority will be providing the overarching management of the project. In addition, it is anticipated that the Authority will be:

- hosting project stakeholder meetings;
- participating in a file-sharing site for ready access to project data; and
- working with the community as the primary point of contact.

The overarching goals are to foster cooperation among parties responsible for the leaking underground storage tank (LUST) incidents, the DEQ and the Authority (collectively referred to

as the project stakeholders) to achieve a final cleanup in a reasonable time frame. Costs associated with these activities are included within this Act 381 Work Plan.

Certain of the remedial tasks described in this scope of work cannot currently be defined in sufficient detail for MDEQ to approve the activities for implementation under Act 381 without conditions requiring follow-up implementation work plans to be developed and submitted for its review. Accordingly, this task includes costs for development of implementation work plans for the remedial systems as the scope and technical approach for cleanup is further established.

3.2 DEVELOP/PREPARE BROWNFIELD PLAN AND ACT 381 WORK PLAN

Costs for preparation of a Brownfield Plan and Act 381 Work Plan(s) are included in this work plan as well as MDEQ review fees.

4.0 SCHEDULE AND COSTS

4.1 SCHEDULE OF ACTIVITIES

The initial year of activities will be focused on groundwater monitoring and coordination of efforts amongst the project stakeholders. It is the goal of the Authority that remedial systems be designed and implemented in 2013 and 2014 so that the larger goal of achieving the cleanup targets can be achieved within 5 to 10 years.

4.2 ESTIMATED COSTS

The estimated cost for the activities including contingencies and fees are described in this section below. As previously described, it is the primary goal of the Authority to encourage parties responsible for the contamination to implement the response activities described above. Costs for those response activities completed by liable parties will not be reimbursed through tax increment financing, however the Authority, at its discretion, may elect to implement certain of the response activities described herein to protect public health and the environment and/or to facilitate more active participation by liable parties in the cleanup efforts. The Authority will then elect to either seek reimbursement from liable parties or through tax increment financing, including the capture of school operating taxes, in accordance with this Act 381 Work Plan.

A summary of the eligible activities and the estimated cost of each activity is provided in the following table. Costs for Eligible Activities anticipated for specific parcels or groups of parcels are segregated in the table below.

	DESCRIPTION OF MDEQ ELIGIBLE ACTIVITY	EST. COST
CVS Development Parcels		
1	Additional Response Activity (mechanical and electrical)	\$100,000
2	Additional Response Activity (sparge system OM&M up to 10 years)	\$400,000
3	Additional Response Activity (OM&M of Multiphase Extraction System)	\$100,000
CVS Development Parcels Subtotal		\$600,000
LUST Parcel A		
1	Enhancements to Multi-Phase Extraction System	\$300,000
2	OM&M of Multi-Phase Extraction System (2 years)	\$160,000
LUST Parcel A Subtotal		\$460,000
LUST Parcel C		
1	Design and Install In Situ Groundwater Treatment	\$275,000
2	OM&M of In Situ Groundwater Treatment (up to 10 years)	\$400,000
LUST Parcel C Subtotal		\$675,000
Road ROWs and Remaining Eligible Properties		
1	Remediation System Design, Install, Operation & Maintenance	\$1,500,000
2	Remedial Enhancements and other Additional Response Activities	\$250,000
Road ROWs and Remaining Eligible Properties Subtotal		\$1,750,000
Groundwater Monitoring		
1	Monitoring Well Installation	\$100,000
2	Groundwater Monitoring (Sampling, Analysis, & Reporting) for 10 Years	\$500,000
Groundwater Monitoring Subtotal		\$600,000
Coordination of Activities and Implementation Work Plan Preparation		
1	Environmental Consulting - Oversight and Coordination of Activities	\$100,000
2	Environmental Consulting – Preparation of Preliminary Designs/Implementation Work Plans for Remedial Systems	\$150,000
Coordination and Work Plan Preparation Subtotal		\$250,000
General Activities and Act 381 Plans and Fees		
1	Preparation of the Brownfield Plan	\$10,000
2	Preparation of Act 381 Work Plan (MDEQ)	\$10,000
3	MDEQ Review Fees	\$5,000
4	15% Contingency (applies to Eligible Activities on all Eligible Property)	\$650,250
TOTAL		\$5,010,250

Additional detail concerning certain of the Eligible Activity costs is provided in Table 3 in the Attachments.

The cost of the activities described above is estimated not to exceed \$5,010,250. All of the costs for activities identified in this section will be eligible for reimbursement only if incurred after

the approval of this Plan. It is anticipated that certain of the response activities will require preparation and submittal of technical work plans for MDEQ review prior to implementation.

In addition to the costs outlined above, the BRA uses captured local taxes from active projects to reimburse reasonable and actual administrative and operating expenses of the authority as authorized by Section 13(16) of the Act. Local taxes captured under this Plan will be used by the BRA to reimburse administrative and operating expenses as authorized by and subject to the limitations of the Act.

EXHIBITS

Figures

- Figure 1 Scaled Property Location Map
- Figure 2 Eligibility Property Map(s)
- Figure 3 Approximate Extent of Commingled Plume
- Figure 4 Cleanup Goals and Eligible Property Area DesignationsMap

Tables

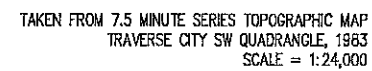
- Table 1 Summary of Property Conditions
- Table 2 Summary of Eligible Activities by Area
- Table 3 Summary of Costs for Eligible Activities
- Table 4 DEQ Tax Capture/Reimbursement Schedule

Attachments

- Attachment A Approved Brownfield Plan and Resolution(s) Approving
- Attachment B Property Description Summary Table
- Attachment C Summary Maps of Groundwater Quality Conditions
- Attachment D Historical Property Use Summary

FIGURES

OBH0103SLM03



PROJECT NUMBER:
OBH-0103

FIGURE:

1

NOVEMBER 2011



Project Boundary



HORIZON ENVIRONMENTAL

Brownfield Plan Eligible Property
Boundary Map

Four Corners Area
Traverse City, Michigan

OBH-0103

Figure Number

2

January, 2012

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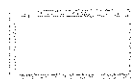
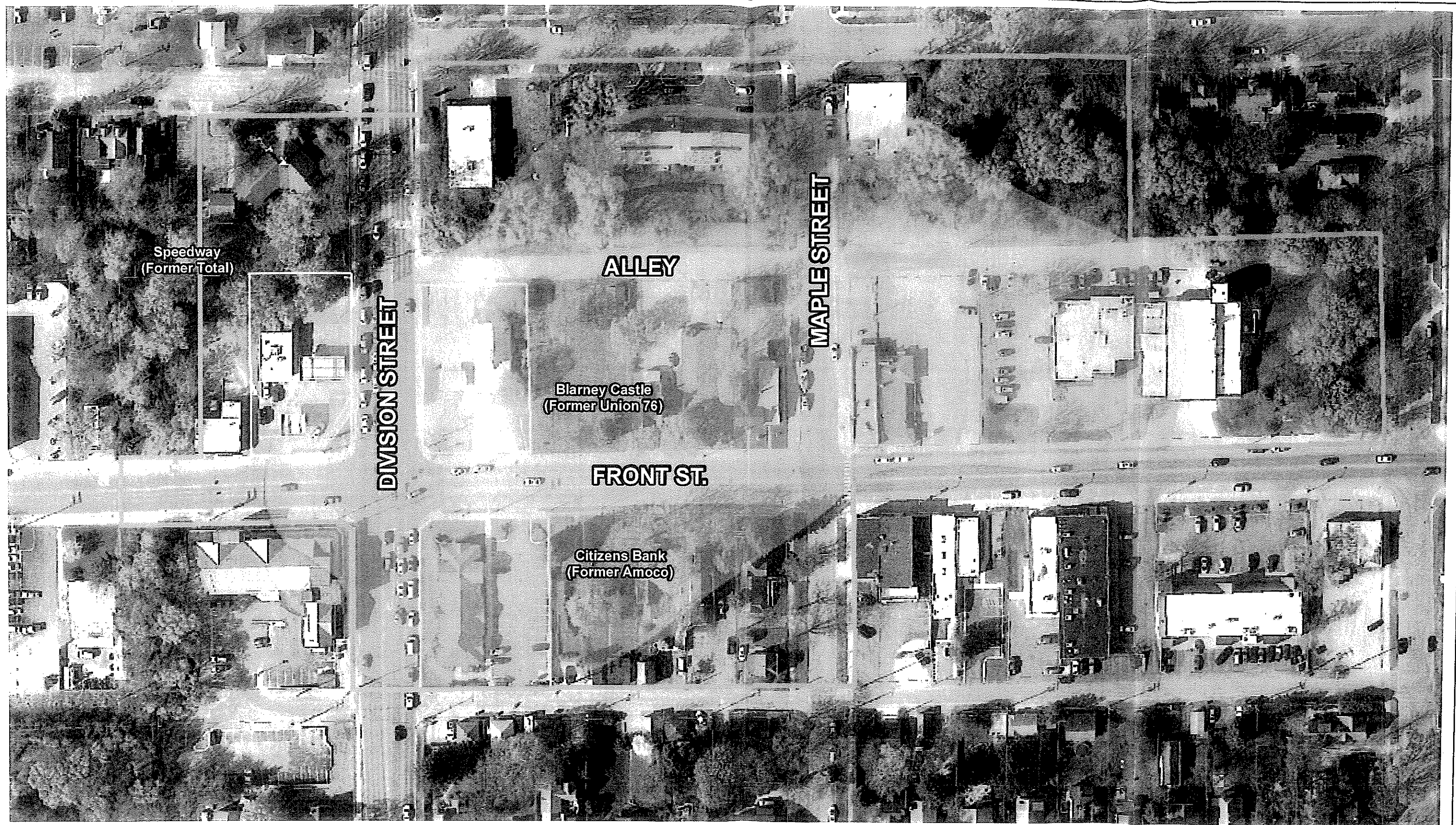
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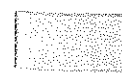
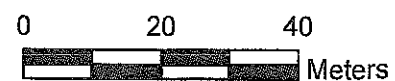
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Four Corners Plan
Property Boundary



Approximate Extent of
Commingled Plume

HORIZON ENVIRONMENTAL

Approximate Extent of
Commingled Plume

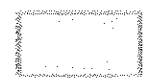
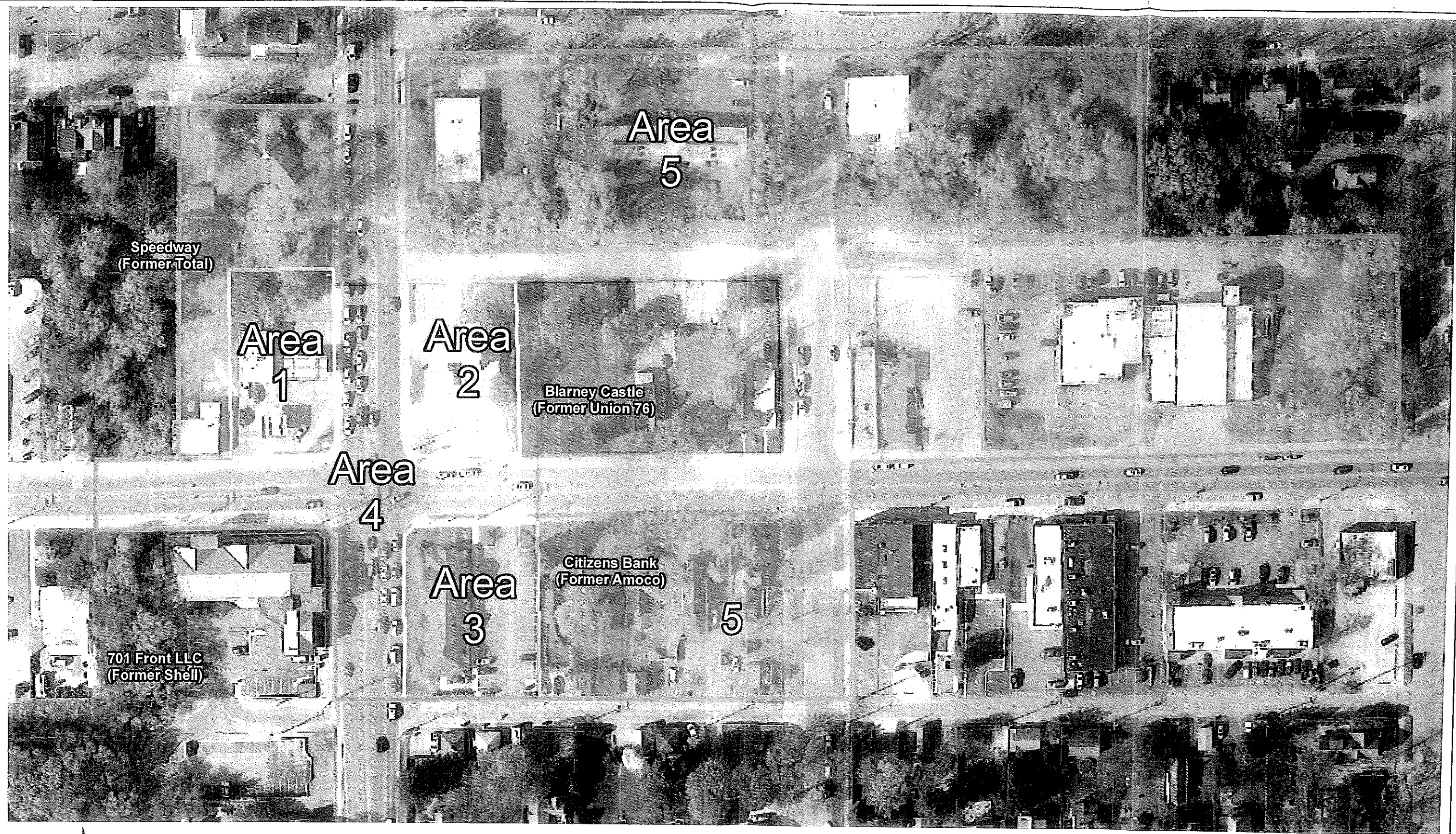
Four Corners Area
Traverse City, Michigan

OBH-0103

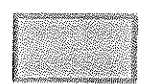
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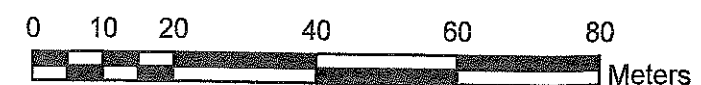
May, 2012



Part 201 Unrestricted
Residential (Including
GSI Criteria)



Part 201 Unrestricted
Non-Residential



HORIZON ENVIRONMENTAL

Cleanup Goals and Area
Designations for Eligible Activities

Four Corners Area
Traverse City, Michigan

OBH-0103

Figure Number

4

May, 2012

TABLES

1

TABLE 2. SUMMARY OF ELIGIBLE ACTIVITIES BY AREA

Four Corners Property
Traverse City, Michigan

AREA ID (Fig.3)	AREA NAME	CURRENT CONTAMINATION RISK FACTORS	OBJECTIVE	NECESSARY ACTIVITIES
1	Speedway/Former Total Petroleum	(1) Free phase product present. Off site migration possible (2) Dissolved phase groundwater contamination migrating off-site. (3) Soil contamination in the smear zone.	Source removal (free phase product) and dissolved phase groundwater and soil remediation.	(1) Commence and continue remediation system operation (MPE) as needed. Subsurface infrastructure in place. (2) Conduct groundwater monitoring.
2	Former Grand Traverse Union 76 (Union 76)	(1) Free phase product adjoining site. (2) Dissolved phase groundwater contamination migrating off-site. (3) Soil contamination in the smear zone. (4) Soil contamination in vadose zone.	Assess current site conditions. Develop site-specific remedial plan. Treatment of ground water contamination. Source removal (free phase product), contaminated soil, and dissolved phase groundwater remediation.	(1) Insall and operate multiphase extraction (MPE) system to treat source conditions (MDEQ to implement in 2012) (2) Address dissolved phase plume through air/biosparge following MPE system operation (3) Conduct groundwater monitoring.
3	Former Finch's Amoco	(1) Free phase product possible at site perimeter. (2) Dissolved phase groundwater contamination migrating off-site.	Assess current site conditions. Dissolved phase groundwater remediation. May also require free phase product recovery.	(1) Groundwater sampling & analysis (2) Evaluate remedial alternatives. (3) Treat dissolved phase contamination in groundwater (4) Conduct groundwater monitoring.

AUG 03 2012

TABLE 1. SUMMARY OF PROPERTY CONDITIONS

Four Corners Property
Traverse City, Michigan

AREA ID (Fig. 3)	AREA NAME	LUST INCIDENT	LUST STATUS	CURRENT KNOWN CONDITIONS	ACTIONS TAKEN TO DATE	CURRENT USE
1	Speedway/Former Total Petroleum	C-1931-92	Open	Free product present on east near dispensers and southeast corner. Dissolved phase contamination present on east and southeast.	Investigation, quarterly groundwater monitoring, design of remediation system, and installation of multi- phase extraction wells.	Convenience store/gasoline retail
2	Former Grand Traverse Union 76 (Union 76)	C-0036-94	Open	Recent investigations identified elevated dissolved hydrocarbons in groundwater, but no free phase product Prior investigations detected free phase product on west and southwest sides.	Site investigations. Limited soil removal from tank vault. Limited sparging attempted in 2009-2010.	Vacant Proposed redevelopment as a CVS pharmacy
3	Former Finch's Amoco	C-0121-91	Open	Dissolved phase contamination present across northern third of property. Free product suspected beneath the northwest corner and adjacent areas.	Site investigation. Installation and operation of a vacuum enhanced remediation system by DEQ for several years, ending in ~2004.	Citizens Bank
4	Public ROW (i.e., street intersection within bounds of the four LUST properties).			Significant hydrocarbon source mass is present in the smear zone and the upper five to seven feet of the saturated interval.	No remedial actions to date. DEQ installing a MPE system in N. Division for future use (2012).	N. Division and W. Front Streets
5	Downgradient, commingled plume			Dissolved phase hydrocarbon contamination in excess of Part 201 generic Residential criteria.	Partial site investigation of extent of impacted groundwater.	Mix of public thoroughfares, private commercial and residential parcels and municipal operations

TABLE 2. SUMMARY OF ELIGIBLE ACTIVITIES BY AREA

Four Corners Property
Traverse City, Michigan

AREA ID (Fig.3)	AREA NAME	CURRENT CONTAMINATION RISK FACTORS	OBJECTIVE	NECESSARY ACTIVITIES
4	Public ROW (i.e., street intersection within bounds of the four LUST properties).	(1) Free phase product migrating off-site. (2) Dissolved phase groundwater contamination migrating off-site. (3) Soil contamination in the smear zone.	Assess current site conditions. Source removal (free phase product) and dissolved phase groundwater remediation.	(1) Groundwater sampling & analysis (2) MPE well installation (DEQ, May 2011). (3) Design, install & operate MPE remediation system (DEQ to implement in 2012). (4) Operate and maintain system.
5	Downgradient, commingled plume	(1) Potential for free phase product to be present. (2) Dissolved phase groundwater contamination migrating off-site.	Assess current site conditions. Determine appropriate contaminant plume remediation management strategy based on actual site conditions and progress of remediation in other management areas.	(1) Groundwater sampling & analysis (2) Complete plume delineation on downgradient portion. (3) Evaluate remedial alternatives. (4) Conduct groundwater monitoring. (5) Monitor hydraulic connection between Kids Creek and groundwater and verify losing stream conditions at all times during hydrologic cycle. (6) Implement remedial enhancement opportunities.

Table 3
Summary of Costs for MDEQ Eligible Activities
Four Corners Area
Traverse City, Michigan

Nature of Approval Request		DESCRIPTION OF MDEQ ELIGIBLE ACTIVITY - Additional Response Activities	EST. COST
CVS Development Parcels			
Approval	1	Additional Response Activity(Sparge system above-ground components)	\$100,000
		<i>Mechanical Installation Including Process Equipment</i>	<i>\$45,000</i>
		<i>Electrical Installation/Process Controls</i>	<i>\$30,000</i>
		<i>Engineering Design and Construction Management</i>	<i>\$25,000</i>
Approval	2	Additional Response Activity (sparge system OM&M up to 10 years)	\$400,000
Approval	3	Additional Response Activity (OM&M of Multiphase Extraction System)	\$100,000
CVS Development Parcels Subtotal			\$600,000
LUST Parcel A			
Conditional	1	Enhancements to Multi-Phase Extraction System	\$300,000
Conditional	2	OM&M of Multi-Phase Extraction System (2 years)	\$160,000
LUST Parcel A Subtotal			\$460,000
LUST Parcel C			
Conditional	1	Design and Install In Situ Groundwater Treatment	\$275,000
Conditional	2	OM&M of In Situ Groundwater Treatment (up to 10 years)	\$400,000
LUST Parcel C Subtotal			\$675,000
Road ROWs and Remaining Eligible Properties			
Conditional	1	Remediation System Design, Install, Operation & Maintenance	\$1,500,000
Conditional	2	Remedial Enhancements and other Additional Response Activities	\$250,000
Road ROWs and Remaining Eligible Properties Subtotal			\$1,750,000

AUG 03 2012

Table 3
Summary of Costs for MDEQ Eligible Activities
Four Corners Area
Traverse City, Michigan

Nature of Approval Request		DESCRIPTION OF MDEQ ELIGIBLE ACTIVITY - Additional Response Activities	EST. COST
Groundwater Monitoring			
Approval	1	Monitoring Well Installation (up to 20 wells)	\$100,000
Approval	2	Groundwater Monitoring (Sampling, Analysis, & Reporting) for 10 Years	\$500,000
		Laboratory Services	\$150,000
		Field Sampling - labor and expenses	\$150,000
		Reporting of groundwater data	\$200,000
Groundwater Monitoring Subtotal			\$600,000
Coordination of Activities and Implementation Work Plan Preparation			
Approval	1	Environmental Consulting - Oversight and Coordination of Activities	\$100,000
Approval	2	Environmental Consulting -- Preparation of Preliminary Designs/Implementation Work Plans for Remedial Systems	\$150,000
Coordination and Work Plan Preparation Subtotal			\$250,000
General Activities and Act 381 Plans and Fees			
Approval	1	Preparation of the Brownfield Plan	\$10,000
Approval	2	Preparation of Act 381 Work Plan (MDEQ)	\$10,000
Approval	3	MDEQ Review Fees	\$5,000
Approval	4	15% Contingency (applies to Eligible Activities on all Eligible Property)	\$650,250
TOTAL			\$5,010,250

Tasks requested for "Approval" can be implemented and reimbursed through MDEQ TIF at the discretion of the Brownfield Authority when it deems the activities necessary

Tasks requested for "Conditional Approval" reflects MDEQ agreement with the use of MDEQ TIF for that activity up to the monetray amount shown, but requires that a follow-up work plan be developed for MDEQ review and approval on the technical approach and associated implementation budget

ATTACHMENT 2C - FOUR CORNERS PROJCT ADDED PARCELS:
FOUR CORNERS TAX INCREMENT FINANCING ESTIMATES SUMMARY TABLE

AUG 03 2012

N. Division and W. Front Streets, Traverse City MI 49864

PLAN YEAR Revolving Loan Fund Year CALENDAR YEAR		1		2		3		4		5		6			
		2011		2012		2013		2014		2015		2016		2017	
BASE VALUE		\$ 2,449,713													
ANNUAL VALUE ADDITIONS		\$ -		\$ 1,840,000		\$ 1,840,000		\$ 920,000		\$ -		\$ -			
CUMULATIVE VALUE		\$ -		\$ 4,899,426		\$ 6,739,426		\$ 8,579,426		\$ 9,499,426		\$ 9,784,409		\$ 9,882,253	
TAXABLE VALUE		\$ -		\$ 2,449,713		\$ 3,369,713		\$ 4,289,713		\$ 4,749,713		\$ 4,892,204		\$ 4,941,126	
DIFFERENCE B/W BASE AND NEW		\$ 0		\$ 920,000		\$ 1,840,000		\$ 2,300,000		\$ 2,442,491		\$ 2,491,413		\$ 2,491,413	
Homestead		\$ -		\$ 0		\$ 690,000		\$ 1,380,000		\$ 1,725,000		\$ 1,831,869		\$ 1,868,560	
Nonhomestead		\$ -		\$ 0		\$ 230,000		\$ 460,000		\$ 575,000		\$ 610,623		\$ 622,853	
REVENUES															
State Taxes		\$ -		\$ 0		\$ 9,660		\$ 19,320		\$ 24,150		\$ 25,646		\$ 26,160	
TC School		\$ -		\$ 0		\$ 4,140		\$ 8,280		\$ 10,350		\$ 10,991		\$ 11,211	
SET		\$ -		\$ 0		\$ 5,520		\$ 11,040		\$ 13,800		\$ 14,655		\$ 14,948	
Local Units of Government		\$ -		\$ 0		\$ 20,827		\$ 41,654		\$ 52,067		\$ 55,293		\$ 56,400	
GT County		\$ -		\$ 0		\$ 4,585		\$ 9,170		\$ 11,463		\$ 12,173		\$ 12,417	
City of TC- operating		\$ -		\$ 0		\$ 12,012		\$ 24,024		\$ 30,030		\$ 31,891		\$ 32,530	
College- NMC		\$ -		\$ 0		\$ 1,996		\$ 3,993		\$ 4,991		\$ 5,300		\$ 5,406	
BATA		\$ -		\$ 0		\$ 301		\$ 602		\$ 753		\$ 799		\$ 815	
Commission On Aging		\$ -		\$ 0		\$ 447		\$ 894		\$ 1,117		\$ 1,187		\$ 1,210	
Medical Care Facility		\$ -		\$ 0		\$ 607		\$ 1,213		\$ 1,517		\$ 1,611		\$ 1,643	
Library Operating		\$ -		\$ 0		\$ 878		\$ 1,757		\$ 2,196		\$ 2,332		\$ 2,379	
Rec Authority															
TBA-ISD		\$ -		\$ 0		\$ 2,697		\$ 5,393		\$ 6,742		\$ 7,159		\$ 7,303	
TOTAL TAXES		\$ -		\$ 0		\$ 33,183		\$ 66,367		\$ 82,959		\$ 88,098		\$ 89,863	
CUMULATIVE CAPTURED TAXES		\$ -		\$ 0		\$ 33,183		\$ 99,550		\$ 182,509		\$ 270,607		\$ 360,470	

State	Mils Levied	
School Operating	0.018	
School Set	0.006	
Total State		24.0000
Local	Mils Levied	
BATA	0.3272	
County	4.9838	
City	13.0567	
Commission On A	0.4858	
Medical Care Faci	0.6595	
College	2.17	
Library Operating	0.9548	
Rec Authority	0.0994	
Total Local		22.7372
TBAISD	Mils Levied	
TBAISD	2.9312	
Total TBAISD		2.9312
Total Levies		49.6684
TOTAL LOCAL		25.6684
TOTAL STATE		24

**ATTACHMENT 2C - FOUR CORNERS PROJCT ADDED PARCELS:
FOUR CORNERS TAX INCREMENT FINANCING ESTIMATES SUMMARY TABLE**

N. Division and W. Front Streets, Traverse City MI 49864

PLAN YEAR Revolving Loan Fund Year CALENDAR YEAR		7	8	9	10	11	12	13	14	15
		2018	2019	2020	2021	2022	2023	2024	2025	2026
BASE VALUE	\$ 2,449,713									
ANNUAL VALUE ADDITIONS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
CUMULATIVE VALUE	\$ 9,981,075	\$ 10,080,886	\$ 10,181,695	\$ 10,283,512	\$ 10,386,347	\$ 10,490,211	\$ 10,595,113	\$ 10,701,064	\$ 10,808,074	
TAXABLE VALUE	\$ 4,990,538	\$ 5,040,443	\$ 5,090,848	\$ 5,141,756	\$ 5,193,174	\$ 5,245,105	\$ 5,297,556	\$ 5,350,532	\$ 5,404,037	
DIFFERENCE B/W BASE AND NEW	\$ 2,540,825	\$ 2,590,730	\$ 2,641,135	\$ 2,692,043	\$ 2,743,461	\$ 2,795,392	\$ 2,847,843	\$ 2,900,819	\$ 2,954,324	
Homestead	\$ 1,905,619	\$ 1,943,048	\$ 1,980,851	\$ 2,019,032	\$ 2,057,595	\$ 2,096,544	\$ 2,135,882	\$ 2,175,614	\$ 2,215,743	
Nonhomestead	\$ 635,206	\$ 647,683	\$ 660,284	\$ 673,011	\$ 685,865	\$ 698,848	\$ 711,961	\$ 725,205	\$ 738,581	
REVENUES										
State Taxes	\$ 26,679	\$ 27,203	\$ 27,732	\$ 28,266	\$ 28,806	\$ 29,352	\$ 29,902	\$ 30,459	\$ 31,020	
TC School	\$ 11,434	\$ 11,658	\$ 11,885	\$ 12,114	\$ 12,346	\$ 12,579	\$ 12,815	\$ 13,054	\$ 13,294	
SET	\$ 15,245	\$ 15,544	\$ 15,847	\$ 16,152	\$ 16,461	\$ 16,772	\$ 17,087	\$ 17,405	\$ 17,726	
Local Units of Government	\$ 57,519	\$ 58,648	\$ 59,789	\$ 60,942	\$ 62,106	\$ 63,282	\$ 64,469	\$ 65,668	\$ 66,879	
GT County	\$ 12,663	\$ 12,912	\$ 13,163	\$ 13,417	\$ 13,673	\$ 13,932	\$ 14,193	\$ 14,457	\$ 14,724	
City of TC- operating	\$ 33,175	\$ 33,826	\$ 34,485	\$ 35,149	\$ 35,821	\$ 36,499	\$ 37,183	\$ 37,875	\$ 38,574	
College- NMC	\$ 5,514	\$ 5,622	\$ 5,731	\$ 5,842	\$ 5,953	\$ 6,066	\$ 6,180	\$ 6,295	\$ 6,411	
BATA	\$ 831	\$ 848	\$ 864	\$ 881	\$ 898	\$ 915	\$ 932	\$ 949	\$ 967	
Commission On Aging	\$ 1,234	\$ 1,259	\$ 1,283	\$ 1,308	\$ 1,333	\$ 1,358	\$ 1,383	\$ 1,409	\$ 1,435	
Medical Care Facility	\$ 1,676	\$ 1,709	\$ 1,742	\$ 1,775	\$ 1,809	\$ 1,844	\$ 1,878	\$ 1,913	\$ 1,948	
Library Operating	\$ 2,426	\$ 2,474	\$ 2,522	\$ 2,570	\$ 2,619	\$ 2,669	\$ 2,719	\$ 2,770	\$ 2,821	
Rec Authority										
TBA-ISD	\$ 7,448	\$ 7,594	\$ 7,742	\$ 7,891	\$ 8,042	\$ 8,194	\$ 8,348	\$ 8,503	\$ 8,660	
TOTAL TAXES	\$ 91,645	\$ 93,445	\$ 95,263	\$ 97,099	\$ 98,954	\$ 100,827	\$ 102,719	\$ 104,630	\$ 106,560	
CUMULATIVE CAPTURED TAXES	\$ 452,115	\$ 545,560	\$ 640,823	\$ 737,923	\$ 836,876	\$ 937,703	\$ 1,040,422	\$ 1,145,052	\$ 1,251,611	

**ATTACHMENT 2C - FOUR CORNERS PROJCT ADDED PARCELS:
FOUR CORNERS TAX INCREMENT FINANCING ESTIMATES SUMMARY TABLE**

N. Division and W. Front Streets, Traverse City MI 49864

PLAN YEAR Revolving Loan Fund Year CALENDAR YEAR		16	17	18	19	20	21	22	23
		2027	2028	2029	2030	2031	2032	2033	2034
BASE VALUE	\$ 2,449,713								
ANNUAL VALUE ADDITIONS		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
CUMULATIVE VALUE		\$ 10,916,155	\$ 11,025,317	\$ 11,135,570	\$ 11,246,926	\$ 11,359,395	\$ 11,472,989	\$ 11,587,719	\$ 11,703,596
TAXABLE VALUE		\$ 5,458,078	\$ 5,512,658	\$ 5,567,785	\$ 5,623,463	\$ 5,679,697	\$ 5,736,494	\$ 5,793,859	\$ 5,851,798
DIFFERENCE B/W BASE AND NEW		\$ 3,008,365	\$ 3,062,945	\$ 3,118,072	\$ 3,173,750	\$ 3,229,984	\$ 3,286,781	\$ 3,344,146	\$ 3,402,085
	Homestead	\$ 2,256,273	\$ 2,297,209	\$ 2,338,554	\$ 2,380,312	\$ 2,422,488	\$ 2,465,086	\$ 2,508,110	\$ 2,551,564
	Nonhomestead	\$ 752,091	\$ 765,736	\$ 779,518	\$ 793,437	\$ 807,496	\$ 821,695	\$ 836,037	\$ 850,521
REVENUES									
	State Taxes	\$ 31,588	\$ 32,161	\$ 32,740	\$ 33,324	\$ 33,915	\$ 34,511	\$ 35,114	\$ 35,722
	TC School	\$ 13,538	\$ 13,783	\$ 14,031	\$ 14,282	\$ 14,535	\$ 14,791	\$ 15,049	\$ 15,309
	SET	\$ 18,050	\$ 18,378	\$ 18,708	\$ 19,042	\$ 19,380	\$ 19,721	\$ 20,065	\$ 20,413
	Local Units of Government	\$ 68,103	\$ 69,338	\$ 70,586	\$ 71,847	\$ 73,120	\$ 74,405	\$ 75,704	\$ 77,016
	GT County	\$ 14,993	\$ 15,265	\$ 15,540	\$ 15,817	\$ 16,098	\$ 16,381	\$ 16,667	\$ 16,955
	City of TC- operating	\$ 39,279	\$ 39,992	\$ 40,712	\$ 41,439	\$ 42,173	\$ 42,915	\$ 43,664	\$ 44,420
	College- NMC	\$ 6,528	\$ 6,647	\$ 6,766	\$ 6,887	\$ 7,009	\$ 7,132	\$ 7,257	\$ 7,383
	BATA	\$ 984	\$ 1,002	\$ 1,020	\$ 1,038	\$ 1,057	\$ 1,075	\$ 1,094	\$ 1,113
	Commission On Aging	\$ 1,461	\$ 1,488	\$ 1,515	\$ 1,542	\$ 1,569	\$ 1,597	\$ 1,625	\$ 1,653
	Medical Care Facility	\$ 1,984	\$ 2,020	\$ 2,056	\$ 2,093	\$ 2,130	\$ 2,168	\$ 2,205	\$ 2,244
	Library Operating	\$ 2,872	\$ 2,925	\$ 2,977	\$ 3,030	\$ 3,084	\$ 3,138	\$ 3,193	\$ 3,248
	Rec Authority								
	TBA-ISD	\$ 8,818	\$ 8,978	\$ 9,140	\$ 9,303	\$ 9,468	\$ 9,634	\$ 9,802	\$ 9,972
	TOTAL TAXES	\$ 108,509	\$ 110,477	\$ 112,466	\$ 114,474	\$ 116,502	\$ 118,551	\$ 120,620	\$ 122,710
	CUMULATIVE CAPTURED TAXES	\$ 1,360,120	\$ 1,470,598	\$ 1,583,063	\$ 1,697,537	\$ 1,814,040	\$ 1,932,591	\$ 2,053,211	\$ 2,175,920

**ATTACHMENT 2C - FOUR CORNERS PROJCT ADDED PARCELS:
FOUR CORNERS TAX INCREMENT FINANCING ESTIMATES SUMMARY TABLE**

N. Division and W. Front Streets, Traverse City MI 49864

PLAN YEAR		24
Revolving Loan Fund Year		
CALENDAR YEAR		2035
BASE VALUE		
	\$ 2,449,713	
ANNUAL VALUE ADDITIONS		
	\$	-
CUMULATIVE VALUE		
	\$	11,820,632
TAXABLE VALUE		
	\$	5,910,316
DIFFERENCE B/W BASE AND NEW		
	\$	3,460,603
	Homestead	\$ 2,595,452
	Nonhomestead	\$ 865,151
REVENUES		
	State Taxes	\$ 36,336
	TC School	\$ 15,573
	SET	\$ 20,764
	Local Units of Government	\$ 78,340
	GT County	\$ 17,247
	City of TC- operating	\$ 45,184
	College- NMC	\$ 7,510
	BATA	\$ 1,132
	Commission On Aging	\$ 1,681
	Medical Care Facility	\$ 2,282
	Library Operating	\$ 3,304
	Rec Authority	
	TBA-ISD	\$ 10,144
	TOTAL TAXES	\$ 124,820
CUMULATIVE CAPTURED TAXES		\$ 2,300,741

ATTACHMENTS

Attachment A

Approved Brownfield Plan and Resolution(s) Approving

AUG 03 2012

RESOLUTION

20-2012

Approval of the Four Corners Remediation Project Brownfield Plan Amendment

WHEREAS, The Brownfield Redevelopment Authority met in regular session on January 25, 2012 and reviewed the amended Brownfield Plan for the Four Corners Remediation Project N. Division Street and W. Front Street with recommendation for approval; and,

WHEREAS, Properties within the Brownfield Plan are in the City of Traverse City; and,

WHEREAS, the Plan identifies eligible environmental activities and Michigan Economic Growth Authority activities at \$6,402,500 and are detailed on Table 2, which is made a part of resolution; and,

WHEREAS, the plan will allow for the comprehensive clean-up of a comingled petroleum contaminate plume that threatens human health and welfare, and impedes use of the land in a district for commerce and essential community uses; and,

WHEREAS, there are ancillary public purposes that will be realized by the public through investment and redevelopment of the area; and,

NOW, THEREFORE, BE IT RESOLVED, THAT:

3. The Brownfield Plan constitutes a public purpose and will facilitate the continued operation and maintenance of remedial systems that;
 - a. In concert with the amended Brownfield Plan for 701 W. Front Street will comprehensively address a comingled petroleum plume that affects public thoroughfares, nearby properties, and threatens nearby surface waters.
4. The Brownfield Plan is consistent with the requirements of Section 14(1) of Act 381 (MCL 125.2664), in particular:
 - a. The Brownfield Plan provides all of the information required in Section 13 of Act 381 (MCL.2663).
 - b. Financing the costs of eligible activities will be through the capture of tax increment revenue, with brownfield plan ending on or before 2032.
 - c. The costs of eligible activities proposed are reasonable and necessary to carry out the purposes of the Brownfield Financing Act.

APPROVED: February 29, 2012

I HEREBY CERTIFY THIS COPY TO BE A
TRUE AND CORRECT COPY OF THE RECORD ON
FILE WITH THE OFFICE OF COUNTY CLERK
LINDA COBURN
GRAND TRAVERSE COUNTY CLERK
BY: *[Signature]*
DEPUTY COUNTY CLERK
DATE: *March 12, 2012*



**Resolution Concurring with Grand Traverse County Brownfield Plan Amendment
Regarding Four Corners Property**

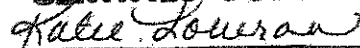
- Because, The Brownfield Redevelopment Authority met in regular session on January 25, 2012 and reviewed the amended Brownfield Plan Four Corners Property Brownfield Plan with recommendation for approval; and,
- Because, Properties within the Brownfield Plan are in the City of Traverse City; and,
- Because, Pursuant to Act 381, concurrence must be received by the governmental unit in which brownfield plan lies, being the City of Traverse City; and,
- Because, the Plan identifies eligible environmental activities and Michigan Economic Growth Authority activities at \$6,402,500 and are detailed on Table 2, which is made a part of resolution; and,
- Because, the plan will allow for the comprehensive clean-up of a comingled petroleum contaminate plume that threatens human health and welfare, and impedes use of the land in a district for commerce and essential community uses; and,
- Because, there are ancillary public purposes that will be realized by the public through investment and redevelopment of the area; now, therefore be it
- Resolved, The Brownfield Plan constitutes a public purpose and will facilitate the continued operation and maintenance of remedial systems that;
- a. In concert with the amended Brownfield Plan for 701 W. Front Street will comprehensively address a comingled petroleum plume that affects public thoroughfares, nearby properties, and threatens nearby surface waters; and, further be it
- Resolved, The Brownfield Plan is consistent with the requirements of Section 14(1) of Act 381 (MCL 125.2664), in particular:
- a. The Brownfield Plan provides all of the information required in Section 13 of Act 381 (MCL.2663).
- b. Financing the costs of eligible activities will be through the capture of tax increment revenue, with brownfield plan ending on or before 2030.

*Resolution Concurring with Grand Traverse County Brownfield Plan Amendment
Regarding Four Corners Property
p. 2*

- b. The costs of eligible activities proposed are reasonable and necessary to carry out the purposes of the Brownfield Financing Act.

I hereby certify that this resolution was adopted by the City Commission for the City of Traverse City at its February 21, 2012, regular meeting held in the Commission Chambers, 2nd Floor, Governmental Center, 400 Boardman Avenue, Traverse City, Michigan.


Benjamin C. Marentette, CMC
City Clerk

CERTIFIED COPY

Benjamin C. Marentette
City Clerk Traverse City MI

